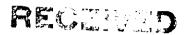
Woodward-Clyde Consultants

Engineering & sciences applied to the earth & its environment

March 17, 1993 91C2628-1 155074



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Mr. S. Andrew Sochanski U.S. Environmental Protection Agency Region 3 841 Chestnut Street Philadelphia, Pennsylvania 19107

Re: Work Plan Revision

Regarding Change in Wetland Delineation Guidance

Former Koppers Company, Inc. Newport Site

Newport, Delaware

Dear Mr. Sochanski:

On behalf of Beazer East, Inc. (Beazer) and E.I. du Pont de Nemours and Company, Inc. (Du Pont), Woodward-Clyde Consultants (WCC) has prepared this letter to inform the U.S. Environmental Agency (EPA) of a work plan revision regarding the wetlands delineation work task.

At the time the Revised RI/FS Work Plan was submitted (December 21, 1992), it was EPA policy that the "Federal Manual for Identification and Delineation of Jurisdictional Wetlands" (Federal Interagency Committee for Wetland Delineation, 1989) should be used when delineating wetland boundaries on CERCLA sites. On January 19, 1993, the EPA published a memorandum of agreement in the Federal Register (Memorandum of Agreement Concerning the Determination of the Geographic Jurisdiction of the Section 404 Program, 58 FR 4995) with an effective date of January 4, 1993. The memorandum of agreement specifies the use of the 1987 Corps of Engineers Wetlands Delineation Manual (Waterways Experimental Station Technical Report Y-87-1) for delineating the geographic scope of waters of the United States under Section 404 of the Clean Water Act. Based on this change in EPA wetland policy, WCC will revise the Work Plan accordingly and will proceed upon approval of the Work Plan with the delineation of the wetlands on the Koppers Site using the 1987 Manual.

03-17-93

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Mr. S. Andrew Sochanski U.S. Environmental Protection Agency March 17, 1993 Page 2

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If you have any questions, please do not hesitate to contact Mr. Robert G. Ehlenberger at (215) 825-3000 or Ms. Jane Patarcity at (412) 227-2185.

Very truly yours,

Derron L. LaBrake Senior Staff Scientist

Robert G. Ehlenberger

Project Manager

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File

cc:

Margie Zhang - DNREC Jane Patarcity - Beazer

Michele Gutman, Esq. - BCCZ

Brandt Butler - Du Pont Joel Karmazyn - Du Pont

Norm Griffiths, Esq. - Du Pont

Ceil Mancini - WCC James Buczala - WCC